

# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA -FILED-

[This form is for non-prisoners to file a civil complaint. NEATLY print in ink (or type) your answers.] SEP 15 2023

Scott Michael martin  
[You are the **PLAINTIFF**, print your full name on this line.]

At \_\_\_\_\_ M  
Chanda J. Berta, Clerk  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

v.

Department of child services  
[The **DEFENDANT** is who you are suing. Put ONE name on this line. List ALL defendants below, including this one.]

Case Number 1 : 23 CV 392  
[For a new case in this court, leave blank.  
The court will assign a case number.]

[The top of this page is the caption. Everything you file in this case must have the same caption. Once you know your case number, it is VERY IMPORTANT that you include it on everything you send to the court for this case. DO NOT send more than one copy of anything to the court.]

## CIVIL COMPLAINT

#	Defendant's Name and Job Title	Address
1	[Put the defendant named in the caption in this box.] Department of child services	201 Rudisille Blvd suit 200 Ft Wayne IN 46806
2	[Put the names of any other defendants in these boxes.] Erica Bashara Family care manager/supervisor	201 Rudisille Blvd suit 200 Ft Wayne IN 46806
3	Jasmine Fox Case working	201 Rudisille Blvd Ft Wayne IN 46806

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and address of each defendant in a separate box as shown here.]

- How many defendants are you suing? 3
- What is your address? 417 S calhoun st Ftwayne IN  
46802
- What is your telephone number: (260) 494-5464
- Have you ever sued anyone for these exact same claims?  
☒ No.  
☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

CLAIMS and FACTS

DO: Write a short and plain statement telling what each defendant did wrong.

DO: Use simple English words and sentences.

**DO NOT:** Quote from cases or statutes, use legal terms, or make legal arguments.

DO: Explain when, where, why, and how these events happened.

DO: Include every fact necessary to explain your case and describe your injuries or damages.

DO: Number any documents you attach and refer to them by number in your complaint.

**DO NOT:** Include the names of minors, social security numbers, or dates of birth.

DO: Use each defendant's name every time you refer to that defendant.

DO: Number your paragraphs. [The first paragraph has been numbered for you.]

1. IN April 2014 Department of child services  
invaded my Residence & brought a child  
case upon my Family Due to False accusation's  
made From unknown source's & Erica bashara  
along with Jasmine Fox my son was Removed  
From my custody and placed with his  
grandmother Cindy Fry he was soon after  
Removed From Cindy Fry's custody & Put with  
a Foster family where he struggled with  
other children & found out The Husband of  
The Foster home was not supposed to be  
around children ② He was then placed with  
another Foster couple where he excelled and  
was happy. when he was found with a  
cell phone communicating with me Scott Martin  
his father he was Removed & placed with  
Greg & Christi Marchell who are Really good  
Friends of The Family where he stayed  
Then ran away. ③ when hearing of  
The incident of him Running away From



## Claims and Facts (continued)

greg & christi marchell's home I called  
 Jasmine Fox At DCS witch informed me  
 that the insodent was True & would let  
 me know as soon as she (Jasmin Fox) ~~had~~ <sup>Had</sup>  
 any up Date's. ④ So a week went BY  
 and I heard nothing back From

## PRIOR LAWSUITS – Have you ever sued anyone for this exact same event?

☒ No.

☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

## RELIEF – If you win this case, what do you want the court to order the defendant to do?

I want the defedent to pay Pain &  
 suffering to my Family & the cost of  
 mental counsiling for depressing not sure a  
 dollar amount But Let's start with  
 \$100,000.00.

## FILING FEE – Are you paying the filing fee?

☐ Yes, I am paying the \$402.00 filing fee. I understand that I am responsible to notify the defendant about this case as required by Federal Rule of Civil Procedure 4. [If you want the clerk to sign and seal a summons, you need to prepare the summons and submit it to the clerk.]

☒ No, I am filing a Motion to Proceed In Forma Pauperis and asking the court to notify the defendant about this case.

[Initial Each Statement]

SM I will keep a copy of this complaint for my records.

SM I will promptly notify the court of any change of address.

SM I declare **under penalty of perjury** that the statements in this complaint are true.

Seatt matre

Signature

9-12-2023

Date

(Jasmine Fox) I Scott M Martin called Erica Bashara who never returned my phone calls<sup>⑤</sup> After several phone calls placed to (Erica bashara) and (Jasmine Fox) with no response no paper work for any kind of notice as to where my son (Travis Martin) is I can't honestly say if my son is dead or alive<sup>⑥</sup> My life has been at a stand still full of emotion's sadness grief stress I want to be notified of where my son could be How can the state take your children with false allegations & crush a whole family's life